

Appl. No. 10/049,947  
Amtd. Dated August 30, 2004  
Reply to Office Action of June 30, 2004

## REMARKS

The Office Action mailed on June 30, 2004, is acknowledged. Applicant requests reexamination of the present application in view of the remarks which follow.

### In the Claims

The Examiner has rejected claims 1-20 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,171,149 to van Zanten. The Examiner asserts that van Zanten discloses an electrical connector (100) for mounting on a printed circuit board (column 3, lines 12-67) in the form of a matrix including a plurality of columns and rows. The Examiner further contends that van Zanten teaches several terminal member groups (101) comprising several terminal members (103) forming fixed SMT contacts to be soldered to the circuit board in a predetermined position, independently of each other, by plastic bodies (105) to which the terminal members (103) are injection-molded. In addition, the Examiner believes van Zanten discloses that several plastic bodies, along with the terminal member groups extending through the same, are adapted to be fixed in predetermined relative positions, with both the plastic bodies and the terminal member groups being movable perpendicularly to the circuit board surface independently of each other. Applicant respectfully disagrees.

A rejection under 35 U.S.C. §102 requires that the anticipatory reference show each and every claim limitation. As the van Zanten reference does not show each and every claim limitation of claims 1 and 11, Applicants traverse the rejection of claims 1-20 under 35 U.S.C. §102.

The present application includes two independent claims, 1 and 11. Each of these claims requires that the electrical connector allow, in part, that the plastic body and terminal member groups extending therethrough be *independently* moveable perpendicular with respect to the circuit board surface. Van Zanten does not disclose this feature, nor is there any hint or suggestion to do so, despite the Examiner's citation to portions of the specification. Van Zanten simply does not, nor could not operate in the manner as disclosed and claimed in Applicants application.

Appl. No. 10/049,947  
Amdt. Dated August 30, 2004  
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In van Zanten, Column 3, lines 8-11, he indicates that "each subassembly can have corresponding features to secure the adjacent modules together, or the connector can use a retainer or housing to surround the subassemblies and hold the subassemblies together." Thus, this language contemplates that the subassemblies will be attached together, to retain them in some fashion as shown in Figure 1. The specification goes on to indicate that the subassemblies have corresponding features to secure the adjacent modules together, that is, these securing features "could be, for example, a protuberance (not shown) on one housing 105 receivable by an opening (not shown) on an adjacent housing 105." (See van Zanten, column 4, lines 51-54). Van Zanten also discloses that "other assembly techniques, such as dove tail grooves, could also be used." (See van Zanten, column 4, lines 54-55). In fact, van Zanten specifically teaches that adjacent housings can be secured to each other in a variety of ways. For example, van Zanten states that adjacent housings forming sub-assemblies can include features to secure the sub-assemblies together to form the connector. Preferably, these securing features include a snap-fit. (See van Zanten, column 4, lines 49-51). Accordingly, van Zanten teaches that the adjacent housings would be secured together and moveable as a single unit. Thus, van Zanten does not teach housings 105 independently moveable of each other.

Moreover, the specification Column 4, Lines 43-48 indicates that it is anticipated that the housing modules be kept as the same height, as described in the specification: "some housings 105 can have keys 141 (see FIG. 4) that engage a corresponding groove (not shown) in the mating connector for alignment purposes. Keys 141 extend to the side of housings 105. When placed beside another housing 105, key 141 centrally locates on the top surface formed by the adjacent housings 105, 105 as seen in FIG. 1." (Emphasis Added).

Figures 8 and 9 of van Zanten depict additional means that lock adjacent housings 105, 105' at a single height. As shown in Figure 8, two housings 105, 105' are joined together via junctions 153. The junctions connect the frame sections located within each of the housings 105, 105', as shown in Figure 2. In Figure 9, the two housings 105, 105' are positioned adjacent each other by bending the junctions 153 in order to align the front faces of the housings. (See van Zanten, column 7, lines 22-24). "When the housings 105,

Appl. No. 10/049,947  
Amdt. Dated August 30, 2004  
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105' are placed side-by-side, junctions 153 connect terminal frame sections 111a, 111a'. This feature provides additional grounding benefits useful in high speed applications." (See van Zanten, column 7, lines 24-27). Furthermore, van Zanten also teaches that adjacent frame sections are also connected, thereby requiring the frame sections in adjacent housings to be moveable as a single unit. Thus, van Zanten does not teach frames located in adjacent housings moveable independent of each other.

**The van Zanten reference teaches four specific reasons why the housing modules 105 are not movable independently of each other.**

1) The specification explicitly states that the housing modules be held together. The specification suggests either locking the modules together or placing them in a housing. Column 3, lines 8-11.

2) The specification teaches that alternate housing modules 105 have keys 141, in order to maintain the height of adjacent modules. Column 4, Lines 43-48.

3) The specification indicates that adjacent module pairs 105, 105', are still connected to each other by the junction 153, as shown in Figures 8 and 9, nor is this junction removed, see column 7, lines 24-27. The permanent interconnection of the lead frames

4) Finally, the connector housing 100 is mateable with a complementary connector assembly such as 200, as shown in Figure 10. The two housing together cannot provide for independent movement of the modules relative to the connector 200.

Thus, there is simply no way that the van Zanten reference teaches the independent movement of the terminals. The Examiner opines that the plastic bodies can be movable in van Zanten, because it does not indicate otherwise. As shown herein, this statement is clearly contradictory to the teachings of the specification of van Zanten.

The above teachings of van Zanten clearly demonstrate that the plastic bodies taught by van Zanten (housings 105) are not moveably perpendicularly to the circuit board surface *independently* of each other, as required by claims 1 and 11. Rather, in van Zanten, the adjacent housings are interlocked in some fashion in order to ensure that the housings are not moveable independently of each other. In addition, frames of adjacent housings are also not moveable independent of each other. Nor is each individual terminal

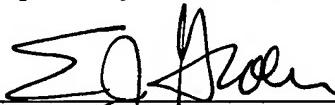
Appl. No. 10/049,947  
Amdt. Dated August 30, 2004  
Reply to Office Action of June 30, 2004

member moveable independent of the remaining terminal members. Thus, van Zanten cannot anticipate these claims. Accordingly, applicant believes claims 1 and 11 are in condition for allowance. Furthermore, as all of the remaining claims depend from claims 1 and 11, applicant believes all claims of the present application are in condition for allowance.

An earnest attempt has been made to respond fully and completely to the Office Action of June 30, 2004. It is believed that this application is now in condition for allowance. Accordingly, passage to issuance is respectfully solicited.

If necessary to effect a timely response, please consider this paper a request for an extension of time sufficient to make this response timely, and charge any fees due therefor, and charge any other fees or credit any overpayment to Baker & Daniels' Deposit Account No. 02-0387 (72262.90025). However, please do not include the payment of issue fees.

Respectfully submitted,



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I hereby certify that this correspondence is being deposited with the U.S. Postal Service as First Class Mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

August 30, 2004

Date



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